

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Jose CALIDONIO-WHITE

Case No. 2:25-mj-30412

Assigned To : Unassigned

Assign. Date : 6/26/2025

Description: CMP USA v

Calidonio-White (SH)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 29, 2025 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

Title 18, United States Code, Section 922(g)(5)(A)

Illegal Alien in Possession of Firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: June 26, 2025City and state: Detroit, MIMichael Everson, Border Patrol Agent*Printed name and title**Judge's signature*Anthony P. Patti, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF APPLICATION  
FOR A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Everson, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since December 2011. Currently, I am assigned to the Detroit Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers, to include Border Patrol Agents (BPA), record checks of law enforcement databases, and/or law enforcement reports. I have also reviewed material from the official Immigration file and system automated data relating to Jose Angel CALIDONIO-WHITE (Alien No. xxx xxx 365).

2. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation. As set forth below, probable cause exists that CALIDONIO-WHITE violated 18 U.S.C. § 922(g)(5)(A) (Alien in Possession of a Firearm) on or about May 29, 2025, in the Eastern District of Michigan.

3. CALIDONIO-WHITE is a citizen and national of Honduras who was arrested on or about May 28, 2023, by Customs and Border Protection at the San Ysidro, California Port of Entry. He was issued a Notice to Appear for lack of a valid entry document and was released into the United States to await his

immigration hearing. On or about July 23, 2024, an Immigration Judge ordered CALIDONIO-WHITE removed from the United States in absentia after he failed to attend his immigration hearing.

4. On May 29, 2025, Detroit BPAs in plainclothes were conducting surveillance in Southwest Detroit when a shooting unrelated to their investigation occurred in their vicinity with the shooting participants being unaware that BPAs were in the area. Agents saw an older model Ford Escape with partial license plate “EUV” encounter a Ford Flex in the street. While the vehicles were parallel to each other, the drivers appeared to have a brief conversation before the Ford Escape drove off towards a stop sign. At that point, BPAs heard a suspected gunshot coming from the direction of the Ford Escape. BPAs then heard and saw the driver of the Ford Flex step out of the vehicle and fire several rounds from a handgun at the Ford Escape. The driver then re-entered the Ford Flex and both vehicles fled the area.

5. BPAs attempted to follow the vehicles but lost visual on the suspects. Agents encountered the Ford Flex and its occupants shortly later but did not locate the Ford Escape that day. However, records checks on the partial license plate revealed that the Ford Escape was registered to an individual with a Detroit address in the Eastern District of Michigan (the “Detroit House”). Agents later conducted physical surveillance and confirmed the location of the Ford Escape at the Detroit

House.

6. In June 2025, Border Patrol, working with the Detroit Police Department, obtained and executed a state search warrant at the Detroit House to search for evidence of a felony firearms offense. On June 11, 2025, during the search, investigators found a black cloth bag containing a Smith and Wesson, M&P Shield 40, .40 caliber pistol along with six A-MERC .40 caliber bullets.

7. Additionally, during the search warrant execution, Agents interviewed Individual-1 and Individual-2 (both individuals known to law enforcement and residing at the Detroit House). Both identified CALIDONIO-WHITE as involved with the May 29, 2025 shooting. Immigration-related record checks revealed that CALIDONIO-WHITE did not have legal status in the United States and had been ordered removed by an Immigration Judge.

8. On June 12, 2025, BPAs arrested CALIDONIO-WHITE outside his suspected residence in Detroit and transported him to the Detroit Border Patrol Station for processing. CALIDONIO-WHITE's fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Integrated Automated Fingerprint Identification System (IAFIS). The results confirmed that CALIDONIO-WHITE is a citizen of Honduras who had previously been ordered removed. The results also revealed that CALIDONIO-WHITE had been removed from the United States three times between April and

May 2023 under Title 42 authority before he was encountered at the border on May 28, 2023 and issued a Notice to Appear.

9. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.

10. On June 12, 2025, after being advised of his *Miranda* rights in Spanish, CALIDONIO-WHITE agreed to speak to investigators about the May 29, 2025, shooting and he provided the following details. CALIDONIO-WHITE told agents that he was picked up by Individual-1 that morning to find food and to buy some crystal meth for CALIDONIO-WHITE. When they drove through a neighborhood, CALIDONIO-WHITE and Individual-1 were confronted by the occupants of the Ford Flex and had a verbal altercation as the vehicles passed each other. As the Ford Escape drove away, Individual-1 shot a pistol one time towards the ground. CALIDONIO-WHITE then stated that one of the occupants from the Ford Flex started shooting towards them while they were driving away and that the vehicle started to chase them through the neighborhood. During the chase,

Individual-1 handed the pistol to CALIDONIO-WHITE, who admitted that he shot the pistol twice towards the Ford Flex to scare off them off. Once CALIDONIO-WHITE and Individual-1 got away from the Ford Flex, they drove to the Detroit House to park the Ford Escape. Individual-1 then went inside the Detroit House to hide the pistol.

11. Because CALIDONIO-WHITE was issued a Notice to Appear, had previously been removed from the United States under Title 42 authority, and had been ordered removed from the United States, there is probable cause to believe that CALIDONIO-WHITE knew he was an alien without lawful status in the United States on or before May 29, 2025.

12. On June 20, 2025, I spoke with Special Agent Josh Mclean of the Bureau of Alcohol, Tobacco, Firearms, and Explosives to request an interstate nexus determination on the Smith and Wesson pistol. Special Agent Mclean advised that the Smith & Wesson pistol is a firearm that is manufactured outside the state of Michigan and therefore had traveled through interstate and/or foreign commerce to reach this jurisdiction.

13. Based on the above facts, I have probable cause to believe CALIDONIO-WHITE, an alien who was illegally or unlawfully in the United States, on May 29, 2025, in the Eastern District of Michigan, knowingly and intentionally possessed a firearm, to wit: a Smith and Wesson, M&P Shield 40, .40

caliber pistol, which had been shipped or transported in interstate or foreign commerce, in violation of 18 U.S.C. § 922(g)(5)(A).



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Michael Everson, Border Patrol Agent  
U.S. Department of Homeland Security

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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Honorable Anthony P. Patti  
United States Magistrate Judge

June 26, 2025